



Office of the Chairman

# National Transportation Safety Board

Washington, D.C. 20594

August 8, 2006

Vice Admiral Thomas J. Barrett  
Administrator  
Pipeline and Hazardous Materials  
Safety Administration  
Washington, D.C. 20590

Dear Admiral Barrett:

Thank you for the April 26, 2006, letter addressing Safety Recommendations P-05-1 through -5, stated below, which the National Transportation Safety Board issued to the Pipeline and Hazardous Materials Safety Administration (PHMSA) as a result of a study on supervisory control and data acquisition systems (SCADA) in liquid pipelines.

## P-05-1

Require operators of hazardous liquid pipelines to follow the American Petroleum Institute's Recommended Practice 1165 [API RP 1165] for the use of graphics on the SCADA screens.

## P-05-2

Require pipeline companies to have a policy for the review/audit of alarms.

## P-05-3

Require controller training to include simulator or non-computerized simulations for recognition of abnormal operating conditions, in particular, leak events.

## P-05-4

Change the liquid accident reporting form (PHMSA F 7000-1) and require operators to provide data related to controller fatigue.

The Safety Board understands that PHMSA is monitoring the American Petroleum Institute's (API's) completion of the Recommended Practice and that API will consider the Board's recommendation P-05-1 while evaluating the draft Recommended Practice.

Further, PHMSA's Controller Certification (CCERT) Project Team is examining the impact of SCADA graphics on controllers, the impact of alarms on controllers, controller training issues, and the need for data to evaluate controller fatigue.

PHMSA announced in the May 1, 2006, *Federal Register* a public workshop to discuss opportunities to enhance the safety of pipeline control and findings from the CCERT Project. The Safety Board understood that the workshop would also assist PHMSA in completing the CCERT Project's report and support API's continued work on API RP 1165. The Safety Board would appreciate an update on the outcome of the workshop and how PHMSA now plans to address these recommendations.

Pending a further response from PHMSA on these initiatives, Safety Recommendations P-05-1 through -4 are classified "Open—Acceptable Response."

P-05-5

Require operators to install computer-based leak detection systems on all lines unless engineering analysis determined that such a system is not necessary.

The Safety Board notes that PHMSA's pipeline integrity regulations require operators to have a means of detecting leaks to protect high consequence areas. However, the regulations stop short of mandating computer-based leak detection systems, even to protect high consequence areas. PHMSA's first round of inspections of integrity management programs revealed that 46 percent of operators did not properly or adequately use prevention and mitigation measures, including leak detection. PHMSA plans more inspections that will include more detailed examinations of leak detection. In addition, PHMSA works include discussion of mandated, computer-based leak detection at its June 27, 2006, public meeting. Pending further response from PHMSA, Safety Recommendation P-05-5 is classified "Open—Acceptable Response."

The Safety Board looks forward to receiving further information on actions to implement Safety Recommendations P-05-1 through -5.

Sincerely,

Original Signed By:

Mark V. Rosenker  
Acting Chairman

cc: Ms. Linda Lawson, Director  
Office of Safety, Energy, and Environment  
Office of Transportation Policy